

Exhibit “J”

Kyle Tate

From: "Kyle Tate" <ktate@tatelawfirm.com>
To: "Chesney, John" <John.Chesney@dbr.com>; "PECK, JULIANNE (PH)" <Julianne.Peck@dbr.com>
Sent: Tuesday, January 13, 2004 1:15 PM
Subject: Meet and Confer re 4th RFP to TAMS

John and Juli,

I'm still waiting for the for the 30(b)(5) responses but would like to move forward based on your recently faxed responses on the meet and confer regarding the 4th RFP to TAMS.

81. What is vague and ambiguous about the request?
82. What is vague and ambiguous about the request?
83. Do you have any such documents? If you do, are you designating such on your privilege log?
84. Withdraw
85. Do you have any such documents? If you do, are you designating such on your privilege log?
86. Do you have any such documents? If you do, are you designating such on your privilege log?
87. Have you disclosed all the documents and if not, when will you do so?
88. I don't understand your objection on this request. The personnel files of the listed TAMS or former TAMS employees are very relevant as you know. Will show personnel issues, problems with performance of job duties, disciplinary actions, why they were terminated, etc. Obviously, if the TAMS your personnel is the cause of the equipment problems, we are entitled to know. Remember, Mike Smith, who stating something like TAMS bought off any problems they may have.
89. When will you produce these documents?
90. Has TAMS produced all the documents in this Request?
91. Has TAMS produced all the documents in this Request?
92. Has TAMS produced all the documents in this Request?
93. Has TAMS produced all the documents in this Request? If not, when will TAMS produce additional documents identified? What about the sales agreement with Butch Holiday?
94. Withdraw here and will explore at TAMS 30(b)(6).
95. Withdraw here and will explore at TAMS 30(b)(6).
96. I don't understand your objection to this request. We have fraud claims against TAMS and will seek punitive damages. Therefore, as you know, we must be able to present the jury with TAMS' net worth so the jury can decide how much to award.
97. I can't believe you state that you don't understand this request or that you honestly believe it is irrelevant! TAMS (you) has explored the area in depositions. Why won't you respond?
98. Remember Mike Smith talking about the jungle drums throughout the company on their marketing strategy - I know you remember that. Anyway, please produce the marketing strategy documents.
99. Same as 98.
100. We believe that TAMS fraudulently induced and intentionally misrepresented the capabilities of the equipment before, during and after the sale to DDI, thus any profit TAMS might have received as a result of such fraud would decrease any possible, if any, damages that TAMS or its agent/partner/joint venturer/alter ego DLL might allege in this case. Please produce the relevant documents per this request.
101. Do documents exist? If so, when will TAMS produce.
- 101(b). Sorry about the numbering. Have all the documents been produced.
102. See 12/24/03 e-mail to John Chesney that clearly sets forth the relevancy. Please produce per the request and the 12/24/03 e-mail which was very specific on this request. Juli and I even e-mailed about the 12/24/03 e-mail so I know you understood the request.
103. Why won't you respond?
104. Why won't you respond? Obviously relevant as such documents would show the inherent problems with the equipment as we have alleged.
105. Same as 104 above.
106. Please respond, your objections makes no sense. If you people were not trained properly then how can you try to blame DDI's operators.
107. Same as 106.
108. Please respond. We are entitled to these relevant documents as explained in 12/24/03 e-mail to John Chesney referenced in 102 as well.

109. Imaging Solutions is Butch Holiday as goes to the mitigation side of the case. The other documents requested will show the history of TAMS in making false representations and the resulting equipment problems.
110. Mechanical Shim - balancing the MRI equipment. Electronic shim - making sure the invisible magnet lines are running in straight lines in and out of the magnet (MRI). Problems with either would cause artifact problems as well as other image problems. Please produce these relevant documents.
111. Are there more docs and when will they be produced?
112. Have all documents been produced?
113. nothing here.
114. Please produce insurance policies per this request and per Rule 26(a)(1)(D) "initial disclosure requirements".
115. Have all documents been produced?
116. Have all documents been produced?
117. Have all documents been produced?
118. Have all documents been produced?
119. Have all documents been produced?
120. Need to know how many Excelart AG's actually existed for many reasons. TAMS' marketing plan and the fact that TAMS' didn't know how repair the equipment problems are just a few relevant reasons.
121. Give me break John, you know that the shortage of service engineers is a relevant issue.
122. See 100 above.
123. Is there an unrecovered investment?
124. Withdraw for now and explore at 30(b)(6).
125. You promised me a response during the break at the DDI 30(b)(6). I have never received such.
126. Same as 125.
127. Same as 96 and 100.
128. Have all the documents been produced.
129. See 12/24/03 to John Chesney e-mail which is very specific. See 108 above as well.

Obviously the above thoughts do not cover every single argument but should be plenty for you to produce the relevant documents or respond otherwise. Please respond promptly so we can conclude our meet and confer for the 4th RFP to TAMS. I didn't proof for spelling or grammatical errors so please ignore any mistakes of that nature.

Thanks,
Kyle

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